

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                           |   |                       |
|---------------------------|---|-----------------------|
| DELTA PILOTS ASSOCIATION, | ) |                       |
|                           | ) |                       |
| Plaintiff,                | ) |                       |
|                           | ) |                       |
| v.                        | ) | No. 1:14-cv-00225-AKH |
|                           | ) |                       |
| JOHN DOE,                 | ) |                       |
|                           | ) |                       |
| Defendant.                | ) |                       |
| _____                     | ) |                       |

**DECLARATION OF MICHAEL E. ABRAM**

I, Michael E. Abram, declare as follows:

1. I am a partner in the law firm of Cohen, Weiss and Simon, LLP which represents non-party Air Line Pilots Association, International (“ALPA”) in this matter. I offer this Declaration in support of ALPA’s Emergency Motion to Enforce the Court’s Protective Order of August 14-15, 2014. I have personal knowledge of the facts set forth in this Declaration.

2. Attached hereto as Exhibit 2 is a true and correct copy of the transcript of the August 14, 2014 hearing before this Court on the motion by the Delta Pilots Association (“DPA”) to compel ALPA and its constituent body the Delta Airlines Master Executive Council to produce certain documents pursuant to subpoenas duces tecum. The Court issued oral and written orders concerning Delta’s motion to compel on August 14 and 15, 2014. As a result of that August 14 order, and as reflected in the transcript, I confidentially disclosed the identity of the Delta Pilot discussed in that hearing to DPA’s counsel, Stanley Silverstone.

3. After the Court issued those orders and prior to October 6, 2014, I had no further contact from DPA or its counsel. Accordingly, neither DPA nor its counsel ever requested of me that ALPA consent to DPA publicly disclosing the identity of the Delta Pilot in a lawsuit, an amended complaint, or otherwise.

4. Attached hereto as Exhibit 3 is a true and correct copy of an email exchanges between Stanley Silverstone (counsel for the Delta Pilots Association) and myself of October 6-7, 2014.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2014

By: /s/ Michael E. Abram  
Michael Abram